## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF TEXAS DALLAS DIVISION

FRANK C. PUGLIA,	§
Plaintiff,	§ § 8
V.	§ Case No. 3:11-cv-01418-N
GENBAND HOLDINGS COMPANY,	8 §
GENBAND MANAGEMENT SERVICES CORP., GENBAND US, LLC (f/k/a	§ §
GENBAND INC.),	§ §
Defendants.	§ §

## DEFENDANTS GENBAND HOLDINGS COMPANY, GENBAND MANAGEMENT SERVICES CORP., AND GENBAND US, LLC'S CORPORATE DISCLOSURE STATEMENT AND CERTIFICATE OF INTERESTED PERSONS

Defendants Genband Holdings Company, Genband Management Services Corporation, and Genband US, LLC (collectively "Defendants") file this disclosure statement and certificate of interested persons as required by Federal Rule of Civil Procedure 7.1 and Local Rule 7.4. Defendants state the following:

- (A) Genband Holdings Company is a Cayman Islands exempted company limited by shares. Genband Management Services Corporation is Delaware corporation. Genband US, LLC is Delaware limited liability company.
- (B) Both Genband US, LLC and Genband Management Services Corporation are whollyowned by Genband Holdings Company.
- (C) JPMorgan Chase & Co., a publicly-held company, indirectly owns 10% or more of Genband Holdings Company. No other publicly-held company has a 10% or greater interest in any of the Defendants.

- (D) To Defendants' knowledge, the following persons and entities and their attorneys may be financially interested in the outcome of this litigation:
  - 1. Plaintiff Frank C. Puglia;
  - 2. Gillespie, Rozen & Watsky, P.C.
  - 3. Defendant Genband Holdings Company;
  - 4. Defendant Genband Management Services Corporation;
  - 5. Defendant Genband US, LLC; and
  - 6. Chubb Group of Insurance Companies.

Dated: August 30, 2011 Respectfully submitted,

BAKER BOTTS L.L.P.

By: s/ Tyler M. Simpson

Jennifer Trulock State Bar No. 90001515 Jonathan Rubenstein State Bar No. 24037403 Tyler M. Simpson State Bar No. 24066091 BAKER BOTTS L.L.P. 2001 Ross Avenue Dallas, Texas 75201-2981

Telephone: (214) 953-6500 Facsimile: (214) 953-6503

ATTORNEYS FOR DEFENDANTS GENBAND HOLDINGS COMPANY, GENBAND MANAGEMENT SERVICES CORP., AND GENBAND US, LLC

## **CERTIFICATE OF SERVICE**

I hereby certify that on August 30, 2011, I electronically filed the preceding document on behalf of Genband Holding Company, Genband Management Services Corp. and Genband US, LLC with the Clerk of the Court using the CM/ECF system which sent notification of such filing to the following:

Hal K. Gillespie State Bar. No. 07925500 Adam S. Greenfield State Bar No. 24075494 GILLESPIE, ROZEN & WATSKY, P.C. 3402 Oak Grove Avenue, Suite 200 Dallas, Texas 75204 Phone (214) 720-2009 Fax: (214) 720-2291

**COUNSEL FOR PLAINTIFF** 

/s Tyler M. Simpson

Tyler M. Simpson